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June 12, 2020

VIA E-FILING

Jocelyn Boyd, Esquire Chief Clerk and Administrator South Carolina Public Service Commission 101 Executive Center Drive Columbia, SC 29210

RE:

Duke Energy Carolinas, LLC Annual Review of Base Rates for Fuel Costs

Docket No. 2020-3-E

Dear Ms. Boyd:

I have enclosed for filing the Petition to Intervene of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record and requesting that each serve me with all outstanding motions or other pleadings, together with all discovery responses served to date and to be served.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.

Scott Elliott

SE/lbk Enclosures

cc:

All parties of record (w/enc.)

STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2020-3-E

IN THE MATTER OF:)	
)	
Duke Energy Carolinas, LLC Annual)	PETITION TO INTERVENE
Review of Base Rates for Fuel Costs of)	
Duke Energy Carolinas, LLC)	

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. That S.C. Code Ann. §58-27-865 (Supp. 2019) established a procedure for annual hearings to allow the Commission and all interested parties to review the fuel purchasing practices and policies of Duke Energy Carolinas, LLC ("Duke" or the "Company") and for the Commission to determine if any adjustment in the fuel cost recovery mechanism is necessary and reasonable. As a part of the docket opened for the review of Duke's fuel purchasing practices and policies, pursuant to S.C. Code Ann. § 58-39-140, the Commission will also determine whether an increase or decrease should be granted in the fuel cost component designed to recover the incremental or avoided costs Duke has incurred to implement the distributed energy resource program previously approved by the Commission.

- 2. That SCEUC is an association organized in the State of South Carolina, consisting of large consumers of energy which are engaged in various manufacturing enterprises throughout the State.
- 3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from Duke.
- 4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.
- 5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.
- 6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.
 - 7. That Petitioner is represented by counsel in this proceeding as follows:

Scott Elliott, Esquire Elliott & Elliott, P.A. 1508 Lady Street Columbia, South Carolina 29201

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WHEREFORE, Petitioner prays for the following relief:

a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;

- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- c. For such other and further relief as is just and proper.

Scott Elliott, Esquire ELLIOTT & ELLIOTT, P.A. 1508 Lady Street Columbia, SC 29201 (803) 771-0555

Attorney for the South Carolina Energy Users Committee

Columbia, South Carolina June 12, 2020

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE:

Duke Energy Carolinas, LLC Annual Review of Base

Rates for Fuel Costs

DOCKET NO .:

2019-3-E

PARTIES SERVED:

VIA ELECTONIC AND REGULAR MAIL

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SC Department of Consumer Affairs

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Samuel J. Wellborn, Esquire Robinson Gray Stepp & Laffitte, LLC 1310 Gadsden Street Columbia, SC 29201 swellborn@robinsongray.com

PLEADING:

PETITION TO INTERVENE BY SOUTH CAROLINA ENERGY USERS COMMITTEE

June 12, 2020

Linda B. Kitchens, Paralegal ELLIOTT & ELLIOTT, P.A.

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